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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Bankruptcy Case No. 19-30088 (DM)

In re:

Chapter 11

PG&E CORPORATION,

(Lead Case) (Jointly Administered)

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

**DECLARATION OF STEPHEN GEORGE IN
SUPPORT OF MOTION TO REDACT
DOCUMENTS FILED IN SUPPORT OF
REORGANIZED DEBTORS' SIXTY-
SEVENTH OMNIBUS OBJECTION TO
CLAIMS (PLAN PASSTHROUGH
WORKERS' COMPENSATION CLAIMS)**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

[No Hearing Requested]

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

1 I, Stephen George, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am Senior Manager, Enterprise Health, at Pacific Gas and Electric Company (the
5 “**Utility**,” and, with PG&E Corporation as debtors and reorganized debtors, the “**Debtors**,” or, as
6 reorganized pursuant to the Plan, “**PG&E**” or the “**Reorganized Debtors**” in the above-captioned
7 chapter 11 cases (the “**Chapter 11 Cases**”). I submit this Declaration in support of the *Motion to Redact*
8 *Documents Filed in Support of Reorganized Debtors’ Sixty-Seventh Omnibus Objection to Claims (Plan*
9 *Passthrough Workers’ Compensation Claims)* (the “**Motion**”),¹ filed contemporaneously herewith.

10 2. In my current position, I am responsible for overseeing all matters relating to workers’
11 compensation, including [add detail]. Except as otherwise indicated herein, all facts set forth in this
12 Declaration are based upon my personal knowledge, the knowledge of other Utility personnel working
13 under and alongside me on this matter, my discussions with PG&E’s professionals and various other
14 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I
15 would testify competently to the facts set forth in this Declaration. I am authorized to submit this
16 declaration on behalf of the Reorganized Debtors.

17 3. The Omnibus Objection seeks to expunge Proofs of Claim filed by employees of the
18 Reorganized Debtors for Workers’ Compensation Claims. Exhibit 1 to the Omnibus Objection lists the
19 names and contact information for certain of the Reorganized Debtors’ current employees who have
20 pending Workers’ Compensation Claims, as well as the dollar amounts asserted.

21 4. The Reorganized Debtors have made a commitment to their employees to keep their
22 information confidential. The Reorganized Debtors want to avoid providing contact information for
23 their employees lest that information be used by members of the public to initiate unwanted contact.
24 Furthermore, such information could be used, among other things, to perpetrate identity theft or to locate
25 survivors of domestic violence, harassment, or stalking.

26
27
28 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
2 correct to the best of my knowledge, information, and belief. Executed this twenty-sixth day of February,
3 2021, in Galt, California.

4 /s/ Stephen George
Stephen George